

Appendix A: Motion to Compel Discovery – Requested Relief

<u>Defendant</u>	<u>Requests</u>	<u>Requested Relief</u>
Henry McMaster	1-9, 12 and 22	Supplement production consistent with date ranges specified in Plaintiffs' requests.
Michael Leach	1-17, 27-28, 30-31 and 34-36	Supplement production consistent with date ranges specified in Plaintiffs' requests.
Michael Leach	29	Produce documents consistent with date ranges specified in Plaintiffs' requests.
Henry McMaster	10-11, 15-17 and 20	Produce documents consistent with date ranges specified in Plaintiffs' requests and without relying on improper relevance, burden and vagueness objections, and without withholding documents potentially also in the possession, custody or control of other parties or non-parties.
Michael Leach	18-20 and 25-26	Produce documents consistent with date ranges specified in Plaintiffs' requests and without relying on improper relevance, burden and vagueness objections, and without withholding documents potentially also in the possession, custody or control of other parties or non-parties.
Henry McMaster & Michael Leach	All Requests	Describe what State Defendants did to search for responsive documents and negotiate in good faith, including on custodians and search terms.